

Commonwealth of Kentucky
Division for Air Quality

PERMIT APPLICATION SUMMARY FORM

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General Information

Name: United States Smokeless Tobacco Manufacturing, LLC
Address: 1600 Main Street, Hopkinsville, Kentucky 42240
Date application received: July 29, 2004
SIC/Source description: 2141
AFS(10-digit) Plant ID: 21-047-00055
Application log number: 56290
Permit number: F-01-030 R3

Application Type/Permit Activity

<input type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input checked="" type="checkbox"/> Permit modification	<input checked="" type="checkbox"/> Conditional major
Administrative	<input type="checkbox"/> Title V
<input checked="" type="checkbox"/> Minor	<input type="checkbox"/> Synthetic minor
__Significant	<input checked="" type="checkbox"/> Operating
<input type="checkbox"/> Permit renewal	<input type="checkbox"/> Construction/Operating

Compliance Summary

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input checked="" type="checkbox"/> Compliance certification signed	

Applicable Requirements list

<input type="checkbox"/> NSR	<input type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR		
<input checked="" type="checkbox"/> Not major modification per 401 KAR 51:017, 1(23)(b) or 51:052,1(14)(b)		

Miscellaneous

☐ Acid rain source
☐ Source subject to 112(r)
☒ Source applied for federally enforceable emissions cap
☐ Source provided terms for alternative operating scenarios
☐ Source subject to a MACT standard
☐ Source requested case-by-case 112(g) or (j) determination
☐ Application proposes new control technology
☒ Certified by responsible official
☒ Diagrams or drawings included
☐ Confidential business information (CBI) submitted in application
☐ Pollution Prevention Measures
☐ Area is non-attainment (list pollutants):

Summary form:

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Emissions Summary

Pollutant	Actual (tpy)	Potential (tpy)
PM	89.6	89.6
SO ₂	1.10	1.10
NO _x	42.41	42.41
CO	23.5	23.5
VOC	84.1	84.1
PH ₃	0.4995	0.4995
HAP	<10.0	<10.0

DESCRIPTION:

REVISION 1

United States Smokeless Tobacco Manufacturing, LLC proposes to merge the adjacent sources, tobacco leaf and drying processes (21-047-00055 and 00056) under one single operation. The plants have three operating permits, O-80-318, O-86-137 (Revised) and S-97-025 (Revision II) whose construction authority will be subsumed into a single federally enforceable permit. The permittee has opted for a federally enforceable conditional major permit limiting the emission below 100 tons for each regulated air pollutant. Potential to emit calculations were based on 8760 hours of operation per year.

MINOR PERMIT REVISION FOR INCREASE USAGE OF FUMIGANT- REVISION 2

U.S. Smokeless Tobacco Manufacturing Limited Partnership applied to the Division for Air Quality in January 28, 2004 to add three laboratory fume hoods for physical/chemical analyses and increase usage of Phosphate Fumigant for insect control in tobacco warehouses. The source proposes an increase in the usage rate of pesticide from 795 to 1590 pounds per year for insect control in the six tobacco warehouses. The current fumigant contains 55 percent aluminum phosphide however, the source request alternative use of pesticide which contains 56 percent magnesium phosphate. The source projects emission of 0.333 pound phosphine gas per pound of solid pesticide used for either aluminum or magnesium phosphide. Current permit usage rate is 265 pounds pesticide per warehouse application, and 530 pound of phosphine gas per warehouse in a year. The hours of operation and the pesticide fogging solution will not change from the existing permitted level (See emission/operating cap description). The three laboratory fume hoods for chemical and physical analyses have been added to the insignificant list, and there are no emissions from these fume hoods. Screen 3 analyses done on total phosphate gas shows that its below the preliminary remediation goal (PRG) limits (See attachment).

MINOR PERMIT REVISION FOR INCREASE USAGE OF FUMIGANT- REVISION 3

U.S. Smokeless Tobacco Manufacturing Limited Partnership applied to the Division for Air Quality on July 29, 2004 to increase in usage rate of pesticide from 1590 to 3000 pounds per year. This will increase the total amount of Phosphine gas emission to 0.4995 ton per year. This will not increase emission of VOC source wide. Based on the MSDS sheet submitted to the Division there would be not health effects to the locality from the increase in the application of the fumigant.

EMISSIONS AND OPERATING CAP DESCRIPTION:

The source has the potential to be a major source for PM, NO_x and VOC emissions. However, the source has requested to be classified as a conditional major source with a federally enforceable limit not to equal or exceed 100 tons per year. The source is limiting generator operations to 500 hours per year. In addition, the source is limiting the leaf operations and drying operations (source units 101, 102, 103, 201 and 202) to 4650 hours per year. The indirect heat exchangers will run for 8760 hours per year, and the application of pesticide fogging solution will not exceed 1440 gallons/year and 576 hours/year. This will limit the potential emissions source-wide for PM and VOC below 90 tons per year, to preclude the applicability of Title V requirements. Also, the permittee is limiting emissions from individual hazardous air pollutants (HAPs), to less than nine (9) tons per year. The operation and the application of solid fumigant pesticide source wide shall not exceed 3000 pounds/year and 288 hour/year respectively. Application per warehouse should not exceed 800 lb.

Comments:

There are no VOC controls in the plant. State regulation 401 KAR 52:030, Federally enforceable permits for non-major sources applies to the source.